

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JOSEPH VAN LOON; TYLER ALMEIDA;
ALEXANDER FISHER; PRESTON VAN LOON;
KEVIN VITALE; and NATE WELCH,

Plaintiffs,

- against -

DEPARTMENT OF THE TREASURY; OFFICE OF
FOREIGN ASSETS CONTROL; JANET YELLEN,
in her official capacity as Secretary of the Treasury; and
ANDREA M. GACKI, in her official capacity as Director
of the Office of Foreign Assets Control,

Defendants.

Civil Action No. 1:23-cv-312-RP

**JOINT APPENDIX OF ADMINISTRATIVE RECORDS CITED
IN PARTIES' CROSS-MOTIONS FOR SUMMARY JUDGMENT**

The parties hereby file this joint appendix containing the administrative record pages cited in their cross-motions for summary judgment and further briefing in support thereof. Specifically, the joint appendix contains the following administrative record citations:

ADMINISTRATIVE RECORD MATERIALS	ADMINISTRATIVE RECORD CITATION
VOLUME I	
Blocking Memorandum	A.R. 1-5
Federal Register Notice	A.R. 6-8
Press Release	A.R. 9-12
Evidentiary Memorandum, Unclassified	A.R. 13-100
Exhibit 4 Tornado Cash, Website, "Torn"	A.R. 124-128
Exhibit 22 Cointelegraph, "What is a Crypto Airdrop, and How Does it Work"	A.R. 212-229

ADMINISTRATIVE RECORD MATERIALS	ADMINISTRATIVE RECORD CITATION
Exhibit 34 Bitcoin.com, “Tornado Cash Governance Token TORN Shudders More than 57% Since the US government Ban”	A.R. 332-337
Exhibit 39 Medium, “Tornado.cash Trusted Setup Ceremony”	A.R. 355-358
Exhibit 48 GitHub, “Tornado Repositories”	A.R. 403-409
Exhibit 54 U.S. Department of the Treasury, Press Releases, “Treasury Takes Robust Actions to Counter Ransomware”	A.R. 474-479
Exhibit 58 Ethereum, “Ethereum Accounts”	A.R. 505-513
Exhibit 59 Chainalysis, “Dissecting the DAO: Web3 Ownership is Surprisingly Concentrated”	A.R. 514-525
Exhibit 61 Medium, “Tornado.Cash Governance Proposal”	A.R. 530-543
VOLUME II	
Exhibit 62 Coin Center, “How does Tornado Cash Work?”	A.R. 544-576
Exhibit 63 Chainalysis, “Crypto Mixers and AML Compliance”	A.R. 577-582
Exhibit 87 Medium, “Decentralizing TornadoCash: The Launch of Tornado Fund and the Path Towards Tornado DAO”	A.R. 717-721
Exhibit 89 Crypto.com, “Crypto Tokens vs Coins—What’s the Difference?”	A.R. 727-737
Exhibit 90 Etherscan, “Token Torn Token”	A.R. 738-741
Exhibit 103 Ethereum, “Intro to Ethereum”	A.R. 814-821
Exhibit 104 Thompson Reuters, “Blockchain Technology: Data Privacy Issues and Potential Mitigation Strategies”	A.R. 822-830
Exhibit 107 Ethereum, “Transactions”	A.R. 856-872
Exhibit 108 Certik, “What is Blockchain Analysis—Blog”	A.R. 873-883

ADMINISTRATIVE RECORD MATERIALS	ADMINISTRATIVE RECORD CITATION
Exhibit 110 Council on Foreign Relations, “Cryptocurrencies, Digital Dollars, and the Future of Money”	A.R. 891-897
Exhibit 116 Chainalysis, “Crypto Mixer Usage Reaches All-time Highs in 2022, With Nation State Actors and Cyber Criminals Contributing Significant Volume”	A.R. 933-941
Exhibit 120 Tornado Cash, Website, “Introduction”	A.R. 950-954
Exhibit 121 Cointelegraph, “TORN Soars 200% as Tornado.Cash’s Governance Token Becomes Tradable”	A.R. 955-960
Exhibit 144 AltcoinBuzz, “Make 61% APY with TORN on this Platform”	A.R. 1176-1180
Exhibit 154 Medium, “Validator Node FAQ”	A.R. 1285-1294
Exhibit 157 Ethereum, “Decentralized Autonomous Organizations”	A.R. 1312-1322
Exhibit 176 Crypto News Australia, “Tornado Cash Token (TORN) Surges 94% following Bullish Protocol Updates”	A.R. 1594-1599
VOLUME III	
Exhibit 178 Chainalysis, “The 2022 Crypto Crime Report”	A.R. 1611-1751
Exhibit 179 U.S. Attorney General, Cyber Digital Task Force, “Cryptocurrency Enforcement Framework”	A.R. 1752-1835
Exhibit 199 Harvard Law School Forum on Corporate Governance, “An Introduction to Smart Contracts and Their Potential and Inherent Limitations”	A.R. 2140-2149
Exhibit 202 U.S. Department of the Treasury, Press Release, “U.S. Treasury Sanctions Notorious Virtual Currency Mixer Tornado Cash”	A.R. 2199-2202
Exhibit 204 The Block.co, “Tornado Cash DAO votes to Take Partial Control Over Treasury Funds”	A.R. 2210-2213

Dated: June 21, 2023

Respectfully submitted,

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